



# NATIONAL TRANSLATOR ASSOCIATION

*OUR AIM – TO PROVIDE FM and TV SIGNALS in EVERY HOME*

Office of the President, B. W. St. Clair, 2355 Ranch Dr., Westminster, CO 80234 303-465-5742 stcl@comcast.net

September 7, 2007

The Honorable Kevin J. Martin, Chairman  
Federal Communications Commission  
445 12<sup>th</sup> St., SW  
Washington, DC 20554

Re: Unlicensed Devices in the “White Spaces” of the TV Spectrum, ET Doc 04-186

Dear Chairman Martin:

The National Translator Association membership consists of the owners, operators and support personnel who are associated with the operation of translators, which bring free over-the-air TV to areas which do not get a full measure of direct reception.

We are the people most likely to be impacted for better or worse by the final decision regarding the use of the “White Spaces” in the TV band.

Our members would like better and less costly access to broadband Internet connections but not at the expense of disrupting the reception of free over-the-air television.

We are an all volunteer organization with limited resources and do not have technical expertise to offer beyond the content of our previously submitted comments. However, we would like to point out there is not yet a consensus as to workable rules that will allow the desired results while adequately protecting over-the-air reception.

We believe the technical staff at the FCC should not be forced to rush to conclusions in order to complete a Report and Order in October. The outcome is too important.

We believe that thorough field-testing is essential and the tests should be done in a representative selection of urban, suburban and rural environments and a wide range of climatic conditions. We believe that the development of any rules that will have a critical impact must be an interactive process. Develop a “first try” set of rules, conduct field tests based on these rules, revise the rules and field test again.

Translator delivered digital signals are beginning to penetrate translator served areas and thanks to the error correction ability of the 8VSB system the results are pictures that are greatly improved over translator delivered analog signals.

We sincerely hope that everyone at the FCC concerned with this rulemaking will proceed strictly following the best engineering principles and will exercise great caution in order to fully protect our growing digital reception.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'BW St Clair', with a small flourish at the end.

Byron W. St. Clair  
President

Cc: The Honorable Michael J. Copps  
The Honorable Jonathan S. Adelstein  
The Honorable Deborah Taylor Tate  
The Honorable Robert M. McDowell



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445 12<sup>th</sup> St., SW  
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Dear Commissioner Adelstein:

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The Honorable Robert M. McDowell, Commissioner  
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